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Attorneys for Defendants
The Wildcat Vineyards LLC dba
Sarah's Vineyard

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROBERTO CELESTINO, GERALDO
PACHECO, JOSE MONTEJANO AND
GERALDO M. CELESTINO, individually and
on behalf of others similarly situated,

Plaintiffs,

v.

THE WILDCAT VINEYARDS LLC DBA
SARAH'S VINEYARD, AND DOES 1 TO
10,

Defendants.

Case No. C 08 00994

CLASS ACTION

**JOINT STATUS REPORT AND
[PROPOSED] ORDER EXTENDING
DEFENDANT'S TIME TO RESPOND TO
PLAINTIFFS' COMPLAINT**

The parties jointly submit the following Joint Status Report:

A. Ongoing Settlement Negotiations

In this class action lawsuit, plaintiffs Roberto Celestino, Geraldo Pacheco, Jose Montejano and Geraldo M. Celestino ("plaintiffs") assert that defendant The Wildcat Vineyards LLC, dba Sarah's Vineyard ("defendant") owe them, and similarly situated employees, unpaid overtime wages and associated penalties.

Ever since defendant received plaintiffs' complaint, defendant has been diligently investigating plaintiffs' claims, reviewing its time and payroll records, and sharing with plaintiffs

1 such information in a good faith attempt to resolve the parties' dispute amicably and without
 2 incurring unnecessary litigation costs. The process of evaluating and negotiating a potential
 3 settlement, however, has taken a considerable amount of time, and the parties jointly request that
 4 the Court allow additional time for defendant to respond to plaintiffs' complaint in the event the
 5 parties cannot informally resolve the matter.

6 **B. Time Frame Necessary to Resolve Matter**

7 Defendant intends to continue informally producing documents containing wage and hour
 8 information to plaintiffs, but needs until the end of May to find, review, and produce relevant
 9 records, and to sort relevant, non-privileged information from confidential information about
 10 employees that are not involved, or likely to be involved, in this lawsuit. Plaintiffs, in turn, will
 11 also need additional time to review and analyze documents provided by defendant. The parties
 12 anticipate that settlement negotiations will likely continue through the end of June.

13 **C. Request to Extend Time for Defendant to Respond to Plaintiffs' Complaint to**
 14 **July 11, 2008**

15 The parties jointly request that the Court extend defendant's time to respond to plaintiffs'
 16 complaint to July 11, 2008 so that defendant can focus on providing plaintiffs with relevant, non-
 17 privileged documents at this pre-discovery stage in furtherance of the parties' good faith settlement
 18 negotiations. Extending defendant's time to respond to plaintiffs' complaint July 11, 2008 will not
 19 impose any extra burden on the Court, because the initial case management conference is not
 20 scheduled to take place until August 18, 2008, and will save each party unnecessary litigation
 21 expense.

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STIPULATED AND AGREED.

DATED: May 15, 2008

LAW OFFICE OF ADAM WANG

By: /s/ Adam Wang

Adam Wang

Attorneys for Plaintiffs

Roberto Celestino, Geraldo Pacheco, Jose

Montejano And Geraldo M. Celestino

DATED: May 12, 2008

COBLENTZ, PATCH, DUFFY & BASS LLP

By: /s/ Katherine C. Zarate

Katherine C. Zarate

Attorneys for Defendants

The Wildcat Vineyards LLC dba

Sarah's Vineyard

SO ORDERED.

DATED: _____, 2008

JUDGE OF THE SUPERIOR COURT